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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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AVALON RISK MANAGEMENT  
INSURANCE AGENCY, LLC

Case No. 12-CIV-3934-(LGS)(DF)

Plaintiff,

vs.

GREGORY TAYLOR,  
ADELE ROSSANO,  
JOHN ROSSANO,  
JAMES ROSSANO,  
THEADORA ROSSANO,  
and JOHN DOES 1 – 10

**PLAINTIFF'S NOTICE  
OF MOTION FOR SUMMARY  
JUDGMENT**

Defendants.

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**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Motion for Summary Judgment date February 2, 2015; the Declaration of Robert Borak dated February 2, 2015, and the Exhibits annexed thereto; and the prior pleadings, motions and proceedings herein, Plaintiff, Avalon Risk Management Insurance Agency, by its attorneys, Spector Rubin, P.A., will move this Honorable Court on February 2, 2015, or as soon thereafter as counsel may be heard, for an Order granting summary judgment in favor of Plaintiff, pursuant to Federal Rules of Civil Procedure 56.

Dated: February 2, 2015

Miami, Florida

By: /s/ Robert Borak

**Andrew Robert Spector**  
**Robert Mark Borak**  
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